

DEC 15 2005

For The Northern Mariana Islands
By _____
(Deputy Clerk)

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF THE NORTHERN MARIANA ISLANDS

ROBERT D. BRADSHAW,

Plaintiff,

vs.

COMMONWEALTH OF THE NORTHERN
MARIANA ISLANDS, NICOLE C.
FORELLI, WILLIAM C. BUSH, D.
DOUGLAS COTTON, L. DAVID SOSEBEE,
ANDREW CLAYTON, UNKNOWN AND
UNNAMED PERSONS IN THE CNMI
OFFICE OF THE ATTORNEY GENERAL,
ALEXANDRO C. CASTRO, JOHN A.
MANGLONA, TIMOTHY H. BELLAS,
PAMELA BROWN, ROBERT BISOM, AND
JAY H. SORENSEN,

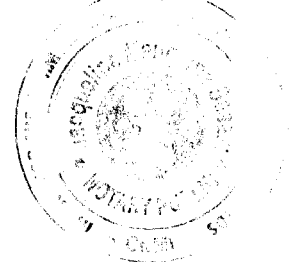
Defendants.

Case No. 05-0027

AFFIDAVIT OF JUSTICE JOHN A.
MANGLONA IN SUPPORT OF EX PARTE
MOTION EXTENDING TIME

I, Justice John A. Manglona, under penalty of perjury, declare as follows:

1. I am an individual, of the age of majority, currently residing on Saipan and employed as a Supreme Court justice by the Commonwealth of the Northern Mariana Islands ("CNMI") Supreme Court.
2. I make this *ex parte* request without waiving my affirmative defense of lack of personal jurisdiction due to improper service in the above-entitled action.
3. I have not yet been able to retain local counsel but plan to do so. I need time to select the appropriate practitioner who will then need time to respond.



1 appropriate practitioner who will then need time to respond.

2 4. Because of the voluminous nature of Plaintiff Bradshaw's complaint and the sporadic
3 means of service undertaken, I require additional time to file a dispositive motion or
4 responsive pleading to Plaintiff's Complaint.

5 5. The members of the Supreme Court judiciary are usually represented by the Attorney
6 General's office. Because of a conflict, the AG's office is unable to represent me. It is
7 highly unusual for Defendant to be in a position where he is required to search for local
8 representation and, as such, Defendant must carefully consider the appropriate practitioner
9 to retain.

10 6. At present, no other extensions of time have been requested and no other deadlines were
11 previously set, except for the deadline of December 23, 2005 for Defendants represented by
12 the AG who received (were able to begin to work with) the Amended Complaint far earlier.

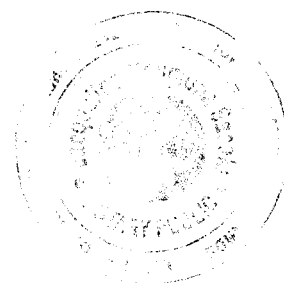
13 7. Granting this extension request will not have any discernable effect on this proceeding.

14 8. On December 6, 2005 at 10:45am, Supreme Court Law Clerk Deborah E. Fisher attempted
15 to contact Plaintiff Bradshaw telephonically to obtain his fax number, if one exists, or
16 request his assent to extend Defendant's deadline to respond to Plaintiff's complaint until
17 January 31, 2006. Plaintiff Bradshaw represented that he does not have access to a fax
18 machine, but he did consent to the extension of time to January 31, 2006 orally.

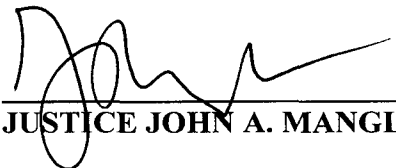
19 9. I declare under penalty of perjury that the foregoing is true and correct to the best of my
20 knowledge.

21 //

22 /



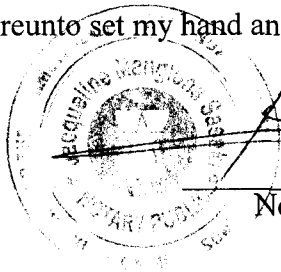
Executed on Saipan this 14th day of December, 2005.

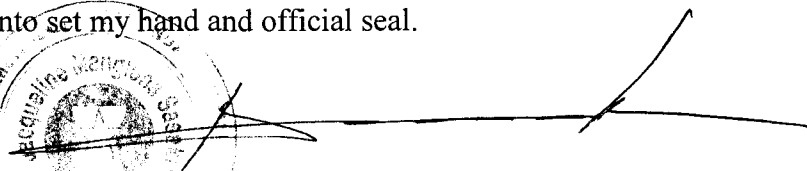

JUSTICE JOHN A. MANGLONA

COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS)
SAIPAN)

On this 14th day of December, 2005 before me personally appeared Justice John A. Manglona, known to me to be the person whose name is subscribed to the foregoing Affidavit, and acknowledged that he executed the same for the purposes therein contained.

In Witness Whereof, I hereunto set my hand and official seal.




Notary Public

My Commission Expires Jun 16, 2007